

REMARKS

In the Office Action, claims 1-13, 17-29 and 33-45, 49 and 50 are rejected under 35 U.S.C. § 103(a) as allegedly obvious over U.S. Patent No. 5,263,162 to Bush et al. (hereinafter "Bush") in view of newly-cited U.S. Patent No. 6,308,887 to Korman et al. (hereinafter "Korman"). The remaining claims are rejected as inherent in view of Bush. Applicants respectfully traverse the rejections of record.

Independent claim 1 is directed to a method for generating identification data, comprising the steps of:

providing an ATM PIN related to a first transaction type that is an ATM transaction; and

performing a cryptographic operation upon the ATM PIN, thereby generating a non-ATM electronic commerce PIN based on said ATM PIN, said non-ATM electronic commerce PIN to be entered by a user in a second transaction type that is a non-ATM financial transaction.

Applicants incorporate fully and reiterate herein the arguments set forth in Applicants' Amendment dated July 2, 2004 respecting the arguments repeated in the Final Office Action.

Claim 1 recites that the non-ATM electronic commerce PIN is to be *entered by a user* in a second transaction type. The Examiner admits that the CGIPIN of Bush, which the Examiner equates to the cryptographically-generated non-ATM electronic commerce PIN of the present invention, is not entered by a user. Office Action, p. 3. The CGIPIN of Bush is produced by a central computer and by a PIN card, and is then transmitted and compared electronically without any interaction from the cardholder. (*See, e.g.*, Bush, col. 2, lns. 26-34). The CGIPIN of Bush, therefore, would be incapable of performing certain non-ATM electronic financial transactions, such as e-commerce transactions via the internet, during which a user may be required to enter account and PIN information to complete a transaction.

The Examiner, however, cites to Korman as allegedly disclosing a user entering an electronic commerce PIN. Office Action, p. 3, *citing* Korman, Abstract, col. 4, ln. 50 – col. 5, ln. 37.

Applicants respectfully submit that the combination of these references under §103 is improper. It would be impossible to combine the system of Korman with the system of Bush since, as described above, the Bush system performs CGIPIN creation and transmission without *any* interaction from the cardholder. The system of Bush could not be modified for use with Korman, and, in fact, *teaches away* from the system of Korman, because the system of Bush intends *not* to allow user access to the CGIPIN. The cryptographic operations for creating the CGIPIN and the transmission of the CGIPIN in Bush are meant to remain unknown to the user. Indeed, it would be impossible for a user to utilize the CGIPIN of Bush because it is derived at time of use based on a mathematical operation using a “constantly changing pseudo-random number generated by the central computer.” Bush, col. 2, lns. 38-42. As a result, the CGIPIN is used only once, by the system for the given transaction, and then a *new* CGIPIN is generated for a next transaction. A user cannot see nor enter any PIN information in the system of Bush.

Accordingly, Bush is wholly incompatible and not combinable with a system in which a user enters an e-commerce PIN. Accordingly, because the systems described in Bush and Korman are incompatible, the present invention could not possibly be obvious in view of the combination of references, since one of ordinary skill in the art at the time of the invention would not have considered the possibility of combining these two references.

For at least this reason, the cited combination of references cannot render the claimed invention obvious. Additionally, Applicants respectfully submit that, as discussed in

Applicants' July 2, 2004 Response, Bush fails to disclose several other limitations of the claimed invention.

In view of the foregoing, Applicants submit that claims 1-13, 17-29, 33-45, 49 and 50, all of the pending claims, are in condition for allowance. In the event that the application is not deemed in condition for allowance, the Examiner is invited to contact the undersigned in an effort to advance the prosecution of this application.

Respectfully submitted,



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